RCRA INSPECTION FORM

Report Prepared for:

Generator [X]

Transporter [X]

HWM (TSD) facility [X]

Copy of report sent to the facility [X]

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Facility Information

Name: Benjamin Moore & Co

Address: 134 Lister Ave
Newark NJ 07105

County: Essex

EPA ID#: NJD002456242

Date of Inspection: 12/1/82

Participating Personnel

State or EPA Personnel: Mike Nalbone
N.J.D.E.P

Facility Personnel: John Caruso
PLANT Superintendent

Report Prepared by Name: Mike Nalbone

Agency: NJDEP

Telephone #: (609) 292-5560

Approved for the Director by: _____

-A-

Summary of Findings Page 1

Facility Description and Operations

The company is a paint mfg. company that primarily deals with trade sale coatings, water thin coatings and solvent thin coatings with various application uses (interior and exterior)

The operation consists of a 3 shift operation which includes two shifts for manufacturing and a round the clock 3 shift operation for shipping. The plant has been operating for 56 years. As reported to me half the plant is used for manufacturing all the products and the other half of the plant is used for warehousing.

There are two discharge lines going into the Passaic Valley Sewerage Authority as reported to me by chief engineer Gary Lehnert. One outlet discharge is hooked-up from the central lab- bldg. and the second hook-up is connected to the main plant. The only industrial wash water discharged into this system according to G. Lehnert is the scrubber water from the resin plant. The rain water runnoff is directed towards a manual pump station. This water is then placed in a holding pond.

-A-

Summary of Findings Page 2

Facility Description and Operations

During the mfging. process the paint product is in contact with various pieces of equipment. This equipment is cleaned and those cleaning agents are water and mineral spirits. The type of cleaning agent used depends whether its a water base paint or a oil base paint. The water wash is considered NON hazardous and the mineral spirits is D001 ignitable therefore designated as Hazardous waste. Although there is waste wash water generated Benjamin Moore reutilizes 100% of it. There is a point in this procedure where the wash solution gets to thick with paint. When this occurs the paint solids are drummed and the liquid solution left is then added again to the next wash solution. The drummed solids are sent out for disposal to one of three TSD facilities. (SCA, Dupont, S & W WASTE).

I was also informed that the D001 waste includes paint skins which are cleaned off of the top of paint batches in tanks every 6 months. Hazardous Waste is also generated from washing vehicles. Tank trailers are washed out by a caustic wash solution as reported by Mr. Caruso.

Facility Description and Operations

The wash solution from the cleaned tank trailer is placed back into a storage tank. Several washes can be done with the same wash solution. Once the solution gets to sludgy, the solids are drummed and placed in a storage area for haz. waste disposal. The wash solution is then charged and the system starts again.

The company has made an effort in cleaning up the site. Diked area's were clean with very little spillage, area's requireing dikes were diked, unloading and loading area's are protected with spill containment berms. A more organized drum storage area exists with signs directing where certain types of material should be placed and proper labeling on the drums.

On 12/1/82 a RCRA inspection was conducted at Benjamin Moore and Company. During the inspection I recieved from Mr Couso a xerox copy of an analysis of the wash water sludge done on 5/24/82.

Also during the inspection three samples were taken. For every sample taken a second sample was taken for Benjamin Moore and Company. These were identified as

BENJAMIN MOORE = D.E.P
#1 sample = MN 118
#2 sample = MN 119
#3 sample = MN 120

Mike Mallone
Environmental Specialist

12/1/82

INSTRUMENT LABORATORY

Analysis Report

Date: 5/24/82

Project Number: 284 Origin: Barry Jenkin, Quality Assurance Laboratory

Sample Number: Wash Water Sludge - 5/12/82 - Newark Factory D-Tank

Laboratory Book Nos: 23018-15

Wt. per gal.: (lbs.) Not Applicable

Non-Volatile Matter: (Wt. %) Not Applicable

Ash (Wt. %): Not Applicable

Acid No.: (100% N.V.M.) Not Applicable

pH: Not Applicable

Test Method(s): EPA Extraction Procedure for Solid Waste.

Results: Flash Point (closed cup): > 142°F

The concentration of each of the specified hazardous metals in the extract is as follows:

Metal	Concentration PPM	Permissible Extract Level PPM
Arsenic	0.008	5.0
Barium	2.5	100.0
Cadmium	< 0.05	1.0
Chromium	< 0.1	5.0
Lead	< 1.0	5.0
Mercury	< 0.001	0.2
Selenium	< 0.002	1.0
Silver	< 0.1	5.0

Robert J. Bonadies

Robert J. Bonadies

Request for Instrumental Analysis

Instrument Laboratory Project File No. 284 Date 5/24/82

Name Barry Jenkin Lab. of Origin Quality Assurance Laboratory

1) List of samples to be tested (include relevant standards when possible):

1. Wash Water Sludge - Dated 5/12/82
   Newark Factory, D-Tank.

2) Description of samples:

Tan colored paint like material.

3) Object of test:

Determine if this sludge sample is hazardous based on EPA Metal Extraction Procedure and Flash Point regulations.

4) Specific test procedure instructions (if any):

EPA Metal Extraction Procedure
Federal Register Vol. 45, No. 98.

5) Give any relevant information and/or specifications (separate sheet, if necessary):

6) Note any special safety precautions:

Approval by John Oberle
John J. Oberle

Describe the activities that result in the generation of hazardous waste.

1) Cleaning operations during trailer wash procedures.
2) Cleaning operations during equipment wash procedures.
3) Cleaning operations during tank skimmings on paint batch

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

159 000 lbs - 1981

159 000 lbs - 1982

Am't should be cut in half by 1983

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☒ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Benjamin Moore & Co EPA I.D. Number: NJD002456242

COMPANY ADDRESS: 134 Lister Ave

COMPANY CONTACT OR OFFICIAL: G. Saldo

TITLE: Environ. Plant Coord.

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:
- [X] NPDES
- [ ] AIR
- [ ] OTHER

INSPECTOR'S NAME: Nallbone

DATE OF INSPECTION: 3/15/82

BRANCH/ORGANIZATION: N. J. D.E.P.

TIME OF DAY INSPECTION TOOK PLACE: 10:00 a.m

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

- [X] Company admits that its waste is hazardous during the inspection.
- [ ] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- [ ] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- [ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- [ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- [ ] EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- [ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	___	___

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

For waste storage:
(1) 10,000 gal. tank
(4) 20,000 gal tanks
(9) 1000 gal tanks

Liquid water wastes -
Solvent wash waste -
Liquid solvents & sludge in 55 gallon containers -

(2) Does the facility generate hazardous waste?	X	___	___
(3) Does the facility transport hazardous waste?	X	___	___
(4) Does the facility treat, store or dispose of hazardous waste?	X	___	___

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	X	___	___
b. Is there a suitable barrier which completely surrounds the active portion of the facility? Fence on 3 sides, water way on 4th side.			
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X	___	___
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	X	___	___
a. If "YES", what are the approximate quantities? approximatly 150 drums of solvent			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste? drums stored outside	X	___	___
c. If "YES", explain in rear of property away from truck traffic thruout plant.			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	X	___	___
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X	___	___
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X	___	___
- damage the structural integrity of the device or facility containing the waste?	X	___	___
- threaten human health or the environment?	X	___	___

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

— During my inspection I noted various areas used for drum storage. (waste MATERIALS) I would recommend ONE or TWO specific area's for waste storage and also these area should be diked.

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	X		
- a telephone or other device to summon emergency assistance from local authorities?	X		
- portable fire equipment?	X		
- adequate aisle space?	X		
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	X		

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. The site needs all the above procedures because of the flammable materials on site.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?			N/A
If you have, please comment, as appropriate.			N/A
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.			N/A
b. Do you believe that operation of this facility may affect groundwater quality?			N/A
c. If "YES", explain.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		X	
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?			N/A
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)			
c. Does each manifest (or a representative sample) have the following information?			N/A
- a manifest document number			

* This requirement applies only after November 19, 1981.

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	___	___	___
- the name, and EPA identification number of each transporter	___	___	___
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	___	___	___
- a DOT description of the wastes	___	___	___
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	___	___	___
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	___	___	___
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.	___	___	___
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	X	___	___
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ___ All wastes are basically the same X Company treats all waste as hazardous ___ Don't Know ___			
b. Does hazardous waste come to this facility from off-site sources?	___	X	___
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	___	N/A	___
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?	X	___	___
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?	X	___	___
c. Does the owner/operator record inspections in a log?	X	___	___
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.	X	___	___

N/A

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. Is there written documentation of the following:			
- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	X		
- type and amount of training to be given to personnel in jobs related to hazardous waste management?	X		
- actual training or experience received by personnel?	X		
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)	X		
a. Does the plan describe arrangements made with local authorities?	X		
b. Has the contingency plan been submitted to local authorities?	X		
How do you know?			
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?	X		
d. Does the plan have a list of what emergency equipment is available?	X		
e. Is there a provision for evacuating facility personnel?	X		
f. Was an Emergency Coordinator present or on call at the time of the inspection?	X		
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?			N/A
- location and quantity of each waste?			N/A
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?			N/A
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?			N/A
*(16) Does the facility have written closure and post-closure plans? (§265.110)	X		
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?	X		

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	X		
- a description of the steps necessary to decontaminate facility equipment during closure?	X		
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	X		
b. What is the anticipated date for final closure? when company no longer operates	X		
†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?		N/A	
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?		N/A	
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?		N/A	
- the name, address and phone number of a person or office to contact during post-closure?		N/A	
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? approx $26,000			
*(18.) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)		N/A	
		N/A	
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)			
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?		N/A	
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?		N/A	

† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

	YES	NO	DON'T KNOW
CONTAINERS (§265.170)			
1. Are there any leaking containers? If "YES", explain. 4 55 gal drums were leaking while in storage. These drums contained waste material	X	X	
2. Are there any containers which appear in danger of leaking? If "YES", explain. one drum totally rotted, only thing holding material in was plastic liner.	X		
3. Do wastes appear compatible with container materials?	X		
4. Are all containers closed except those in use?		X	
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	X		
6. How often does the plant manager claim to inspect container storage areas? once a day			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		X	
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	X		

9. What is the approximate number and size of containers with hazardous wastes?

Approx. (270) 55 gal. drums of solvent waste
Approx. (125) 55 gal. drums of Alkyd sludge
Approx. (50) 55 gal drums unknown

TANKS (§265.190)	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain.	X		

only A spill occurred because #4 fuel oil tank overflowed instead of transferring oil into another tank. The dike now has approx ⅛" of #4 oil in it.

2. Are there any tanks which appear in danger of leaking. If "YES", explain.		X	
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		X	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	X		
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	X		
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		X	

7. How often does the plant manager claim to inspect container storage areas? every day

8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain. X — In there own area (tank farm) away from plant activities

9. What is the approximate number and size of tanks containing hazardous wastes? one tank holding waste that is for disposal. 10,000 gallons capacity. Other tanks: (4) 20,000 gallons and (9) 1000 gallons are used for waste that is recycled into process.

SURFACE IMPOUNDMENTS (§265.220)			
1. Is there at least 2 feet of freeboard in the impoundment?			
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.	___	___	___
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.	___	___	___
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

1. Is the waste pile protected from wind erosion?	___	___	___
a. Does it appear to need such protection?	___	___	___
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.	___	___	___
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.	___	___	___
a. Is the pile placed on an impermeable base that is compatible with the waste?	___	___	___
b. Is the pile protected from precipitation and run-on?	___	___	___
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	___	___	___
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.	___	___	___
5. How many waste piles are on site, and approximately how large are they?			

LAND TREATMENT (§265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil? Please explain.	___	___	___

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?	___	___	___
*3. Is run-off collected?	___	___	___
4. Are food chain crops being grown on the facility property?	___	___	___
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or	___	___	___
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.	___	___	___
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?	___	___	___
5. Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	___	___	___
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?	___	___	___
b. control of run-off, release of airborne particulate contaminants?	___	___	___
c. compliance with requirements for the growth of food-chain crops (if they are present)?	___	___	___
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.	___	___	___
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.	___	___	___
10. What is the area of the land receiving hazardous waste treatment?	___	___	___

LANDFILLS (§265.300)

†1. Is run-on diverted away from the active portions of the landfill?	___	___	___
†2. Is run-off from active portions of the landfill collected?	___	___	___

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* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

	YES	NO	DON'T KNOW
3. Is waste which is subject to wind dispersal controlled? Explain.	___	___	___
4. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell	___	___	___
- the contents of each cell and approximate location of each hazardous waste type	___	___	___
5. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?	___	___	___
- control of surface water infiltration?	___	___	___
- prevention of erosion?	___	___	___
6. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	___	___	___
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.	___	___	___
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?	___	___	___

11. What is the approximate area of the hazardous waste landfill?

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* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.	___	___	___
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	___	___	___
- halogen content	___	___	___
- sulfur content	___	___	___
- concentration of lead	___	___	___
- concentration of mercury	___	___	___

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?	___	___	___
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed	___	___	___
- auxiliary fuel feed	___	___	___
- air flow	___	___	___
- incinerator temperature	___	___	___
- scrubber flow	___	___	___
- scrubber pH	___	___	___
- relevant level controls	___	___	___
Every hour for:			
- stack plume (color and opacity)	___	___	___
5. Is there open burning of hazardous waste?	___	___	___

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	___	___	___
a. Is there any evidence of fugitive emissions?	___	___	___
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	___	___	___

8. What types of air pollution control devices (if any) are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	___	___	___
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	___	___	___
3. Is there ignitable or reactive waste fed into the treatment system?	___	___	___
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	___	___	___
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	___	___	___

5. Describe the treatment system at this facility.

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Benjamin Moore & Co.

EPA I.D. Number: NJD002456242

COMPANY ADDRESS: 134 Lister Ave., Newark, NJ.

COMPANY CONTACT OR OFFICIAL: John N. Caruso

TITLE: Plant Superintendent

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:
- [X] NPDES #-0036414 non-contact cooling H2O to Passaic River.
- [X] AIR NJDEP
- [X] OTHER discharge permit to Passaic Valley Sewage Com. Permit #2040312

INSPECTOR'S NAME: Alphonse Iannuzzi

DATE OF INSPECTION: 9-1-81

BRANCH/ORGANIZATION: NJDEP

TIME OF DAY INSPECTION TOOK PLACE: 1345

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

- [X] Company admits that its waste is hazardous during the inspection.
- [X] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- [ ] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- [ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- [ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- [ ] EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- [ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

FEB 8 1 33 PM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	X		

Please explain:
Facility states drums of scrap latex will be reclaimed on site, however these drums are not labeled and appeared to be waste material.

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.
1) Liquid water waste - 5,000 gallons (approx. 90% will be reused)
2) Liquid solvent waste - 86,000 gallons (approx. 15,000 will be disposed within 2 months)

(2) Does the facility generate hazardous waste?	X			3) solvent + paint sludge
(3) Does the facility transport hazardous waste?	X			
(4) Does the facility treat, store or dispose of hazardous waste?	X			500 drums

VISUAL OBSERVATIONS

		YES	NO	DON'T KNOW
(5)	SITE SECURITY (§265.14)			
a.	Is there a 24-hour surveillance system?	X guards		
b.	Is there a suitable barrier which completely surrounds the active portion of the facility?	X		
c.	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X		
(6)	Are there ignitable, reactive or incompatible wastes on site? (§265.27)	X		

a. If "YES", what are the approximate quantities?
approx. 20 drums (55 gal. each).

b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste? X

c. If "YES", explain
No smoking signs, hose, fire equipment

d. In your opinion, are proper precautions taken so that these wastes do not:

- generate extreme heat or pressure, fire or explosion, or violent reaction?	X		
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X		
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X		
- damage the structural integrity of the device or facility containing the waste?		X	drums are rusting
- threaten human health or the environment?		X	spilled material on asphalt may be carried off lot onto soil and threaten the environment. (also spillage on soil in tank farm).

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?
1) Proper labeling and segregation of drums. 2) Prompt removal of waste material
3) Repack leaking and rusting drums.
4) improve house keeping.

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	X		
- a telephone or other device to summon emergency assistance from local authorities?	X		
- portable fire equipment?	X		
- adequate aisle space?	X		
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	X		

all procedures are necessary.

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? no wells		X	N/A
If you have, please comment, as appropriate.			
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. possible groudwater pollution from run off and spilled material in tank farm.			X
b. Do you believe that operation of this facility may affect groundwater quality?	X		
c. If "YES", explain. spilled material on soil in tank farm probably caused slight ground water pollution.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		X	
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? N/A			
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)			
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number			

N/A

* This requirement applies only after November 19, 1981.

	YES	NO	KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	___	___	___
- the name, and EPA identification number of each transporter	___	___	___
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	___	___	___
- a DOT description of the wastes	___	___	___
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	___	___	___
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	___	___	___
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.	___	___	___

N/A

(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13) ___ X ___

a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one)
Waste characteristics vary ____
All wastes are basically the same ✓
Company treats all waste as hazardous ____
Don't Know ____

b. Does hazardous waste come to this facility from off-site sources? ___ X ___

c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest? ___ ___ ___

(12) INSPECTIONS (§265.15)

a. Does the facility have a written inspection schedule? schedule and log are same X ___ ___ ___

b. Does the schedule identify the types of problems to be looked for and the frequency for inspections? X ___ ___

have plant fire prevention safty inspections and general inspection log for storage areas

c. Does the owner/operator record inspections in a log? X ___ ___

d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain. ___ X ___

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ___ X ___
- type and amount of training to be given to personnel in jobs related to hazardous waste management? on the job training only ___ X ___
- actual training or experience received by personnel? ___ X ___

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51) X ___ ___ have fire plan and spcc plan

a. Does the plan describe arrangements made with local authorities? ___ X ___ In the event of a fire facility has an electronic system (ADT) that notifies the Newark F. Dept. automaticly.

b. Has the contingency plan been submitted to local authorities? ___ X ___

How do you know? Mr. Caruso stated as such

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? have emergency co-ordinators in security procedures manual X ___ ___

d. Does the plan have a list of what emergency equipment is available? have maps posted indicating equipment ___ X ___ have map where equipment is available in procedures.

e. Is there a provision for evacuating facility personnel? flow chart X ___ ___

f. Was an Emergency Coordinator present or on call at the time of the inspection? X ___ ___

(15) Does the owner/operator keep a written operating record with: (§265.73)

- a description of wastes received with methods and dates of treatment, storage or disposal? N/A ___ ___ ___
- location and quantity of each waste? X ___ ___
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? N/A ___ ___ ___
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? Never had to use plan ___ ___ ___

*(16) Does the facility have written closure and post-closure plans? (§265.110) X ___ ___

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed? N/A ___ ___ ___

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* Effective date for this requirement is May 19, 1981.

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? — X — —
- a description of the steps necessary to decontaminate facility equipment during closure? — X — —
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed? N/A — — — —

b. What is the anticipated date for final closure? no date — — —

†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? — — X —

d. Does the written post-closure plan include:

- a description of planned groundwater monitoring activities and their frequencies during post-closure? — — —
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure? — — —
- the name, address and phone number of a person or office to contact during post-closure? — — —

N/A

*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? — X — —

*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144) — — X —

*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90) N/A — — —

a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area? N/A — — —

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area? — — —

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† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities) p. 13	
	Other _____	

CONTAINERS (§265.170)

		YES	NO	DON'T KNOW
1.	Are there any leaking containers? If "YES", explain.	X		
2.	Are there any containers which appear in danger of leaking? If "YES", explain. Several rusted containers appear to be close to leaking.	X		
3.	Do wastes appear compatible with container materials?	X		
4.	Are all containers closed except those in use?		X	
5.	Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	X		
6.	How often does the plant manager claim to inspect container storage areas? once daily			
7.	Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		X	
8.	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	X		
9.	What is the approximate number and size of containers with hazardous wastes? 500 drums 55 gallon capacity			

TANKS (§265.190)

	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain. All tanks slightly leaking viscous material from ports in solvent storage tank farm (tanks in concrete dike well contained)	X		
2. Are there any tanks which appear in danger of leaking. If "YES", explain. S. A reclaimed solvent holding tanks contain spillage at base - grey paint semi-liquid on soil, almost entire tank farm floor is covered.		X	
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		X	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? N/A			
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	X		
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		X	
7. How often does the plant manager claim to inspect container storage areas? twice daily			
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	X		

9. What is the approximate number and size of tanks containing hazardous wastes?
10,000 gal latex wash holding tank. Five 10,000 gal. solvent holding tanks.

SURFACE IMPOUNDMENTS (§265.220)

1. Is there at least 2 feet of freeboard in the impoundment?			
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

N/A

RCRA INSPECTION REVIEW SHEET

Name of Facility - Benjamin Moore
RCRA ID# - NJD002456242
Date of Inspection - 3/15/82
Type of Inspection: Generator Transporter TSD
Name of EPA/State Inspector -
Mike NALBONE

Findings of Inspection: 262.31, 32
265.171
265.173

Action(s) Taken:

Action(s) Recommended:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TRANSPORTER INSPECTION CHECKLIST

Transporter Name: Benjamin Moore EPA I.D.: NJD002456242

Transporter Address: 134 Lister Ave Driver: _____

	Yes	No	
1. Does the transporter have an EPA I.D. number?	( )	( )	
2. Is the transporter carrying hazardous waste?	( )	( )	
3. Does the transporter have a manifest?	( )	( )	
4. Does the manifest show the following information:			
a. Name, address, I.D. of generator	( )	( )	N/A
b. Name, address, I.D. of transporter	( )	( )	
c. Name, address, I.D. of designated facility	( )	( )	
d. Name of alternative facility	( )	( )	
e. DOT waste description	( )	( )	
f. Quantity of waste-volume, weight, number of containers	( )	( )	
g. Signed certification statement	( )	( )	
5. Does the manifest information confirm vehicle load?	( )	( )	
6. Is the vehicle placarded for hazardous waste?	( )	( )	

7. General comments: Coordinator informed me that Benjamin Moore does not transport any hazardous waste.

Inspected by: M. NALBONE

Date: 3/15/82

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: Benjamin Moore & Co. EPA I.D. NUMBER: NJD002456242

COMPANY ADDRESS: 134 Lister Ave Newark N.J.

COMPANY CONTACT OR OFFICIAL: G. Soldo

INSPECTOR'S NAME: Mike Nalbone

TITLE: Environ. Plant Coordinator

BRANCH/ORGANIZATION: NJDEP Solid WASTE Admin.

CHECK IF FACILITY IS ALSO A TSD FACILITY / /

DATE OF INSPECTION: 3/15/82

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	X		

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

/X/ Company admits that its waste is hazardous during the inspection.

/X/ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

/ / The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

/ / The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

/ / The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

/ / EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

/ / Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	___	___

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate-approximate quantities of each.

Type K079 water wash from paint manufacturer
K078 solvent wash from paint manufacturers
D001 solvent sludge " " " Ignitable waste
D006 & D008 water paint sludge

d. Describe the activities that result in the generation of hazardous waste.

All wastes are generated from the paint manufacturing process thru cleaning procedures and wash waters.

(2) Is hazardous waste stored on site?	X	___	___
a. What is the longest period that it has been accumulated?			

approx. 6 - 8 months maximum according to coordinator

b. Is the date when drums were placed in storage marked on each drum?	___	X	___

DATES were on some of the drums (approx 60% of All drums were marked) but not all the drums consisting of waste were marked IN Compliance with 262.31 & .32

(3) Has hazardous waste been shipped from this facility since November 19, 1980?	X	___	___

a. If "yes," approximately how many shipments were made?

Since Nov 19th IN 1980 - 2 shipments
1981 - 30 shipments
1982 - 2 shipments
} Total 34

(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

34

a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?	X	___	___

b. If "no" or "don't know," please elaborate.

	YES	NO	DON'T KNOW
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	X		
- the generator's name, mailing address, telephone number, and EPA identification number	X		
- the name, and EPA identification number of each transporter	X		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	X		
- a description of the wastes (DOT)	X		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	X		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	X		
(5) Were there any hazardous wastes stored on site at the time of the inspection?	X		
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?		X	

b. If not properly packaged or in secure tanks, please explain. A large portion of drums were not sealed tight by lids, or (snap rings). (open Top) Partially closed lids were noted.

c. Are containers clearly marked and labelled? some were not			
d. Do any containers appear to be leaking?	X		

e. If "yes," approximately how many?

(4) 55 gallon drums had some type of leak, or spillage from top from overflowing.

(6) Has the generator submitted an annual report to EPA covering the previous calendar year? Sent annual report X ___ ?

a. How do you know? ~~to~~ N.J.D.E.P. Solid Waste admin.

Coordinator informed me of this.

NOTE checked in Files & did not locate Annual Report

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? X ___ ___

a. If "no," have Exception Reports been submitted to EPA covering these shipments? ___ ___ ___

(8) General comments.

Product TANKS on site are going to be labeled, they are not at this time.
Waste TANKS on site are going to be labeled, they are not at this time.
On Site are old waste materials that are in drums from other BJM plants. This was stopped approx 3 or 4 years ago (around 1979), Material is being removed. (though slowly)

Recycling of water wash - Type K079 occurrs on site (put back in system)

* Disposal of K079 portion of material is recycled. (put back in system)
* solvent wash also used for boiler fuel as a supplement for oil
* w/ water solids recycled into water later paint
* Company has TWO permits for Transporting Haz. Waste - waste goes to SCA pine wood So. Carolina site. Material is mostly solid sludges from paint manufacturing.
* Loading area's of RAW materials was poorly kept. (spillages were noted)
* MANUAL SUMP pump DRAIN had oil from a spill AND is going into Newark Sewage Line
* material spilled → alkyd RESIN during my inspection draining into RR track stones (ground) before workers could clean up area.
* Glycerin & Linseed oils are caught IN buckets during loading into storage tank. Worker picks up buckets, spills the 1st top (4) or (5) inches and places the rest back in the tank.

The effective date for this requirement is March 1, 1982.

Benjamin Moore & Co.
Paints · Varnishes · Enamels

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VANCOUVER

134 LISTER AVE. · NEWARK, N. J. 07105

March 16, 1982

Solid Waste Administration
32 East Hanover Street
Trenton, New Jersey 08625

Attn: Michael A. Nalbone

Dear Mike,

Listed are the following Emergency Equipment available to all personnel under the SPCC Plan:

2 - Air Packs
1 - 10 lb. Halon Extinguisher
2 - 50 lb. Whell Dry Chemicals Ext.
3 - 150 lb. Whell Dry Chemicals Ext.
7 - 5 lb. ABC
4 - 20 lb. Cartridge Dry Chemical
11 - 15 lb. CO_2
49 - 20 lb. ABC
19 - 10 lb. ABC
5 - Pressure Water Ext.
25 - 30 lb. ABC
5 - 30 lb. Dry Chemical Ext.

We also have four fire hose boxes outside with brand new hose and nozzles. All hoses were pressure checked by City Fire. If there are any questions, please call Bill Bretzger, City Fire, Ferry Street, Newark.

Sincerely,

Gary C. Soldo

Gary C. Soldo

GCS/jg

March 16, 1982

Personnel Training for Hazardous Waste SPCC Plan

1) Edwin Slingerland - Captain of Fire Brigade - 6 years
   Handling Hazardous Waste
2) Dennis Flanagan - Handling Hazardous Waste 3 years
3) Ronald Fallon - Hazardous Waste 5 years
4) Arnold Adams - Hazardous Waste 2 years
5) John Daniels - Supervisor - Hazardous Waste 5 years
6) Manuel DaCosta - Hazardous Waste 2 years
7) Jose Percivale - Hazardous Waste 4 years
8) Michael Jarrett - Hazardous Waste 2 years
9) Frank Kondroski - Hazardous Waste 8 years
10) Gary Soldo - Hazardous Waste Coordinator

All persons have been working with many of our hazardous waste and have been instructed on how to handle these materials in the proper fashion. During any spills of any of our wastes, protective equipment is issued accordingly.

Gary C. Soldo

Gary C. Soldo

General Comments

During my inspection spills were noted thru out the plant. Some spills were from waste storage area's, unloading area's and some were noted in product storage which were going to be shipped out. The inspection log was not filled out today but only two January previous onsite inspections made by the plant coordinator mentioned spills or leaks. All of these spills & leaks could not have happened in one day.

A truck was loading ALKyD during my inspection. A cap on the vehicle which was supposedly welded came loose and approximathy 150 gallons spilled out before corrective measures could be made. The Alkyd spilled material was running down on the railroad tracks and seeping into the gravel rocks between the wooden ties. No dike was in this area for containment.

An over flow of #4 oil existed approx. two months ago according to the coordinator. The diked area was still not pumped out and cleand of the #4 oil. The environmental coordinator could not tell me why drums of material around this area were not marked or labeled.

I observed a worker spill the 1st 4 inches off of the top of a liquid in (2) buckets. I asked what was in the buckets he answered paint oils used in the process and he did this to rid the material of contaminates and water before he dumped it in for processing.

RCRA INSPECTION REVIEW SHEET

Name of Facility - Benjamin Moore & Co.
RCRA ID# - NJD002456242
Date of Inspection - 9-1-81
Type of Inspection: (Generator) Transporter TSD
Name of EPA/State Inspector -
Al Iannuzzi DEP

Findings of Inspection:
violation of:
262.31 & 32 - containers not labeled
262.30 - containers leaking
265.16 - no personnel train.
265.31 - missing some sections & contin. plan.
one manifest, no facility name.
265.170 - leaking / poor condition
265.173
Containers
265.192(b) - LEAKING TANKS
265.199 -

Action(s) Taken:
Will refer State violations - 5 6. no storage

Action(s) Recommended:
Issue complaint for containers - spills, manifest.

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: Benjamin Moore & Co. EPA I.D. NUMBER: NJD002456242

COMPANY ADDRESS:
134 Lister Ave. Newark, NJ

COMPANY CONTACT OR OFFICIAL:
John N. Caruso

INSPECTOR'S NAME:
Alphonse Iannuzzi

TITLE:
plant superintendent
SAYS IT

BRANCH/ORGANIZATION:
NJDEP

CHECK IF FACILITY IS ALSO A TSD FACILITY / /

DATE OF INSPECTION:
9-1-81

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	X		

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

/ / The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

/ / The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

/ / The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

/ / EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

/ / Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	X		

Please explain:
Facility states drums of latex scrap will be reclaimed on site, however, since drums are not labeled these drums appeared to be waste material.

c. Identity the hazardous wastes that are on-site, and estimate approximate quantities of each.
1) Liquid water waste - 5,000 gallons (≅ 90% will be reused)
2) Liquid solvent waste - 86,000 gallons (material used in processes and for cleaning ≅ 15,000 within 2 months will be disposed).
3) Solvent + paint sludges - 500 drums (55 gal.).

d. Describe the activities that result in the generation of hazardous waste.
Tank and process equipment cleaning and process wastes.

(2) Is hazardous waste stored on site?	X		
a. What is the longest period that it has been accumulated? Mr. Caruso stated that drums have been on site since Sept. 1980 (11 months), some			
b. Is the date when drums were placed in storage marked on each drum? many drums are unlabeled.		X	
(3) Has hazardous waste been shipped from this facility since November 19, 1980?	X		
a. If "yes," approximately how many shipments were made? 22			
(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? 22			
a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?	X		
b. If "no" or "don't know," please elaborate.			

	YES	NO	DON'T KNOW
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	X		
- the generator's name, mailing address, telephone number, and EPA identification number	X		
- the name, and EPA identification number of each transporter	X		
one manifest NJ0000868 (2/18/88) no facility name accompanying shipping order - indicates DuPont Deepwater, NJ was facility - the name, address and EPA identification number of the designated facility and an alternate facility, if any: no alternate facility		X	
- a description of the wastes (DOT)	X		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	X		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	X		
(5) Were there any hazardous wastes stored on site at the time of the inspection?	X		
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?		X	
b. If not properly packaged or in secure tanks, please explain. several rusted drums in danger of leaking and some leaking. several were uncapped.			
c. Are containers clearly marked and labelled? 264.34		X	
d. Do any containers appear to be leaking? 264.34	X		
e. If "yes," approximately how many?			

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? 262.41(b) N/A — — —

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? 262.42(a)(b) X — —

a. If "no," have Exception Reports been submitted to EPA covering these shipments? — — —

(8) General comments.

Benjamin moore & Co. manufacture + rade sale paints and Varnishes. Approximatly 5 million gallons paint are produced per year at this facility. Soy bean and linseed oils are used as raw materials. Most products are lead and mercury free. Processes include blending, reacting, and heat treating. Alkyd resins are also manufactured at this facility.

wastes produced from processes include equipment washing with solvent and water. Most of these wastes are held in tanks and used to manufacture other products. Solvent based rinses are disposed at SCA-Earthline, Newark or HWD Long Island, NY. Water based rinses are disposed at SCA-Earthine or DuPont Deepwater, NJ. Caustic waste is produced from tank cleaning. The resulting sludge is stored in drums.

Manifest check revealed that waste material was removed from Benjamin more to A to Z Resources New Brunswick, NJ. on 6-8-78 manifest # A-89717. A to Z was not a registered facility in NJ. and is presently closed.

Facility inspection indicated storage of 250 rusted drums

* The effective date for this requirement is March 1, 1982.

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste)	X		
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary			
All waste are basically the same	X		
Company treats all waste as hazardous			
3) Is there a written waste analysis plan at the facility?	X		
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.	X		
b) Test methods used to test these parameters.	X		
c) Sampling methods to obtain a representative sample of the waste to be analyzed.	X		
d) Frequency of repeated analysis to ensure accurate and current information.	X		
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.		X	
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?			X
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of this facility?	X		
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X		
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?	X		
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?	X		
3) Does the owner/operator record inspections in a log?	X		
4) Is there evidence that problems reported in the inspection log have been remedied?	X		
If no, please explain.			

265.16 - Personnel Training	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	X		
If yes, have facility personnel taken part in an annual review of training?	X		
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	X		
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	X		
—actual training or experience received by personnel?	X		
3) Are training records kept on all employees for at least 3 years?	X		

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

1) Are there ignitable, reactive or incompatible waste on site?	X		
If yes, what are the approximate types and quantities and location of the waste. Solvent oil material ignitable waste. The approximate amount on site is usually 70 drums in the drum storage area.			
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	X		
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?	X		
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	X		
— damage the structural integrity of the device or facility containing the waste?	X		
— threaten human health or the environment?	X		

40 CFR 265 - Subpart C - Preparedness and Prevention	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	X		
— a telephone or other device to summon emergency assistance from local authorities?	X		
— portable fire equipment?	X		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	X		
265.33 Is equipment tested and maintained?	X		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	X		
265.35 Adequate aisle space?	X		
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.			X

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	X		
1) Does the plan describe arrangements made with the local authorities?	X		
2) Has the contingency plan been submitted to the local authorities?	X		
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	X		
4) Does the plan have a list of what emergency equipment is available?	X		
5) Is there a provision for evacuating facility personnel?	X		
6) Was there an emergency coordinator present or on call at the time of the inspection?	X		

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting			
265.71 - Use of the Manifest			
1) Has the facility received hazardous waste from an off-site source since November 19, 1980?			
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?			
If not, please explain.			

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)			
4) Does each manifest have the following information? (circle missing information)			
— a manifest document number?	—	—	—
— the generators name, mailing address, telephone number and EPA I.D. #?	—	—	—
— the transporters name and EPA I.D. Number?	—	—	—
— the TSD name, address, telephone number & EPA I.D. Number?	—	—	—
— a description of the waste (DOT)?	—	—	—
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle?	—	—	—
— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	—	—	—
(Obtain a copy of the incomplete manifests)			

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?	—	X	—
Describe unreconciled descrepancies.			

265.73 - Operating Record

1) Does the facility keep an operating record?	X	—	—
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?	X	—	—
b) The location and quantity of each hazardous waste at each location?	X	—	—
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?	X	—	—
d) Summary reports and details of all incidents that require implementing the contingency plan.			
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?	X	—	—
f) Monitoring, testing or analytical data where required for:			
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?	X	—	—

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?	—	—	X
If yes, has the facility submitted an unmanifested waste report?	—	—	—

40 CFR 265 Subpart F - Groundwater Monitoring	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			X
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?		X	
If yes, please explain			

265.112 - Closure Plan

Does the facility have a written closure plan? (Applies to all types of TSD facilities)	X		
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?	X		
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	X		
3. A description of the steps necessary to decontaminate facility equipment during closure?	X		
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?	X		
5. Does the owner/operator have a written estimate of of the cost of closing the facility?			
If yes, what is it? ($) $29,900 July 6th, 1982 figure estimate			

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? (Applies only to disposal facilities)			X
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($)			

Please circle all appppropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
(Container - pg 6)	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other_____
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) Fifty Five Gallon Drums are used. Type of waste stored IS. Hazardous paint wash sludges and non hazardous water base wash material.			
2) - Is there a containment system for spills, leaks and precipitation?	X		
If yes, describe. The storage area is located on Asphalt Paving and in a location [redacted] to prevent run off if a spill should occur.			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?	X		
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	X		
If not, please explain.			
265.173(a) - Are all containers closed except those in use?	X		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	X		
265.174 - Is the storage area inspected at least weekly?	X		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	X		
265.177 - Are incompatible wastes stored separate from each other?	X		
If no, explain			

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

40 CFR 265 Subpart K - Surface Impoundments	YES	NO	N/A
Describe the design and operating features of the surface impoundment to prevent ground water contaimination (e.g., liner leachate collection system).			
265.220 - Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of wastes stored and treated.			
265.222 - Is there at least 2 feet of freeboard in the impoundment?	___	___	___
265.223 - Do all earthen dikes have a protective cover to preserve their structural integrity?	___	___	___
If yes, please specify the type of covering.			
265.226 - 1) Is the free board level inspected daily?	___	___	___
2) Are the dikes surrounding the surface impoundment inspected for leaks, deterioration or failures inspected weekly?	___	___	___
265.229 - 1) Are any ignitable or reactive wastes placed in the impoundment?	___	___	___
2) If yes, is the waste treated immediately after placement in the impoundment to render the waste non-active and/or non-ignitable?	___	___	___
3) If no, to (2) explain.			
265.230 - Are incompatible wastes placed in the impoundment?	___	___	___
If yes, explain.			

	YES	NO	N/A
40 CFR 265 Subpart L - Waste Piles			
265.250 - How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)			
265.251 - Is the waste pile protected from wind erosion?	___	___	___
a) Does it appear to need such protection?	___	___	___
b) Explain what type of protection does exist.			
265.253 Containment			
1) Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.	___	___	___
2) Is the pile placed on an impermeable base?	___	___	___
3) Is run-on diverted away from the pile?	___	___	___
4) Is the leachate and run-off collected and treated?	___	___	___
If no to any of the above questions above then:			
5) Is the pile protected from precipitation and run-on?	___	___	___
6) Are wastes containing free liquids placed in the pile?	___	___	___
265.256 - 1) Are ignitable or reactive wastes placed on the pile? If no, skip to §265.257	___	___	___
2) Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive? If no, explain.	___	___	___
3) Is the waste protected from any materials or condition that may cause it to ignite or react? If no, explain.	___	___	___
265.257 - Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other device? If no, explain.	___	___	___

40 CFR 265 Subpart M - Land Treatment

265.270 - Identify the types of waste and the size of the land treatment area?

	YES	NO	N/A
265.272 - General Operating Requirements			
1) Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?	___	___	___
Please explain how.			
2) Is run-on diverted from the active portions of the land treatment facility?	___	___	___
3) Is run-off from the active portions of the facility collected?	___	___	___
If yes, is the run-off a hazardous waste?	___	___	___
265.276 - Food Chain Crops			
1) Are food chain crops being grown on the facility property?			
If yes, can the facility operator document that arsenic lead and mercury:	___	___	___
- will not be transferred to the crop or ingested by food-chain animals or	___	___	___
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on the untreated soils.	___	___	___
2) Has notification of the growing of food chain crops been made to the Regional Administrator?	___	___	___
265.278 - Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
Make copy for office review.			
265.279 - Are there records of the application dates, application rates, quantities and location of each hazardous waste placed at the facility?	___	___	___
265.281 - Is ignitable or reactive waste immediately incorporated into the soil so that the resulting waste no longer meets that definition?	___	___	___
If not, please explain.			
265.282 - Are incompatible waste placed in separate land treatment areas?	___	___	___
If no, please explain.			

40 CFR 265 Subpart N - Landfills	YES	NO	N/A
265.300 - Identify the types of waste and size of the landfill.			
265.302 - General Operating Requirements			
1) Is run-on diverted away from the active portions of the landfill?	___	___	___
2) Is run-off from active portions of the landfill collected?	___	___	___
3) Is waste which is subject to wind dispersal controlled?	___	___	___
Please explain how.			
265.309 - Does the owner/operator maintain a map with:			
1) The exact location and dimensions of each cell?	___	___	___
2) The contents of each cell and approximate location of each hazardous waste type?	___	___	___
265.312 - Is ignitable or reactive waste treated so that it is not ignitable or reactive before being place in the landfill?	___	___	___
Explain how you know.			
265.313 - Are precautions taken to ensure that incompatible waste are not placed in the same landfill cell?	___	___	___
If no, please explain.			
265.314 Special Requirements for Liquid Waste			
1) Are bulk or non-containerized wastes containing free liquids placed in the landfill?	___	___	___
If yes,			
a) Does the landfill have a liner which is chemically and physically resistant to the added liquid? or	___	___	___
b) Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
2) Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
Please describe the types and contents of such containers placed in the landfill.			
265.315 - Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried ?	___	___	___
265.316 - Are small containers of hazardous waste in overpacked drums placed in the landfill?	___	___	___
If yes, please describe precautions taken to prevent the release of the waste.			

	YES	NO	N/A
265.382 Is there open burning of hazardous waste?	___	___	___
a) If yes, what is being burned? (Only burning or detonation of explosives is permitted)			
b) If open burning or detonation of explosives is taking place approximately what is the distance from the open burning or detonation to the property of others?			

40 CFR 265 Subpart Q - Chemical, Physical and Biological Treatment (other than in tanks, surface impoundments or lant treatment facilities)

1) Describe the treatment system at this facility and the the types of wastes treated.

265.401 - Does the treatment process system show any signs of ruptures, leaks or corrosion? ___ ___ ___

If yes, describe.

265.401 - Is there a means to stop the inflow of continuously-fed hazardous wastes? ___ ___ ___

265.403 - Inspections

1) Is the discharge control safety equipment (e.g. waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order? ___ ___ ___

Are they inspected at least once each operation day? ___ ___ ___

2) Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design? ___ ___ ___

Is data gathered at least once each operating day? ___ ___ ___

3) Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams? ___ ___ ___

4) Are the discharge confinement structures, (e.g. dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g. wet spots or dead vegatation? ___ ___ ___

265.405 - Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or or conditions which may cause it to ignite or react? ___ ___ ___

If yes, explain how.

265.406 - Are the incompatible wastes placed in the same treatment process? ___ ___ ___

If yes, please explain.

40 CFR 265 Subpart O - Incinerator and Thermal Treatment	YES	NO	N/A
1) What type of incinerator or thermal treatment is at the site (e.g waterwall incinerator, boiler, fluidized bed, etc.)			
2) List the types and quantities of HW incinerated or thermally treated.			
3) Is the residue from the incinerator thermal treatment unit a hazardous waste?	—	—	—
4) What types of air pollution control devices (if any) are installed in the incinerator/or thermal treatment unit?			
5) Is energy recovered from the process? If yes, describe.	—	—	—
6) What is the destruction and removal efficiency for the organic hazardous waste constituents?			
265.341 and 265.375 - Does the operating record include additional analysis' to determine types of pollutants which might be emitted including:			
- heating value of the waste?	—	—	—
- halogen and sulfur content?	—	—	—
- concentrations of lead and mercury?	—	—	—
If no to any of the above questions is there justification and documentation?	—	—	—
265.345 and 265.373 If operating, does it appear the incinerator/or thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	—	—	—
265.347 and 265.377 - Monitoring and Inspection			
1) Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	—	—	—
If no, explain			
2) Does the incinerator/thermal treatment have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments)	—	—	—
If no, explain.			
3) Is the stack plume observed visually at least hourly for opacity and color?	—	—	—
4) Are there any signs of leaks, spill and fugitive emissions associated with the pumps, valves, conveyors, pipes etc? If yes, describe.	—	—	—
5) Are all emergency shutdown controls and system alarms checked to assure proper operation?	—	—	—
6) Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained. If yes, explain.	—	—	—
7) Is the incinerator/thermal treatment inspected daily?	—	—	—

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General	YES	NO	N/A
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?	X		
Is the waste hazardous?	X		
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	X		
40 CFR 262 Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?	X		
If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.	35 shipments		
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?	X		
— the generators name, mailing address, telephone number and EPA I.D. Number?	X		
— the transporters name and EPA I.D. Number?	X		
— the name, address and EPA ID Number of the designated facility?			
— a description of the wastes (DOT)?	X		
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	X		
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	X		
(obtain a copy of the incomplete manifests)			
40 CFR 262 - Subpart D - Recordkeeping and Reporting			
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	X		
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?			
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

	YES	NO	N/A
40 CFR 262 - Subpart C - Pretransportation Requirements			
262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:			
1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179)	X		
2) Label each package according to DOT (i.e., 49 CFR 172)	X		
3) Mark each package according to DOT (i.e., 49 CFR 172)	X		
4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304)			
262.34 Accumulation Time			
1) How is waste accumulated on-site?			
☒ Containers			
☐ Tanks			
☐ Surface impoundments (complete HWMF checklist)			
☐ Piles (complete HWMF checklist)			
2) Is waste accumulated for more than 90 days?	X		
If yes, complete HWMF checklist			
3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?		X	
4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?	X		

Some containers were NOT dated Although Most of the drums were labeled.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers	YES	NO	N/A
265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?			
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?			
If not, please explain.			
265.173(a) - Are all containers closed except those in use?			
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			
265.174 - Is the storage area inspected at least weekly?			
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?			
265.177 - Are incompatible wasts stored separate from each other?			

	YES	NO	N/A
40 CFR 265 Subpart J - Tanks			
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	___	___	___
If yes, have facility personnel taken part in an annual review of training?	___	___	___
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	___	___	___
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	___	___	___
—actual training or experience received by personnel?	___	___	___
3) Are training records kept on all employees for at least 3 years?	___	___	___
40 CFR 265 - Subpart C - Preparedness and Prevention			
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	___	___	___
— a telephone or other device to summon emergency assistance from local authorities?	___	___	___
— portable fire equipment?	___	___	___
-- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	___	___	___
265.33 Is equipment tested and maintained?	___	___	___
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	___	___	___
265.35 Adequate aisle space?	___	___	___
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	___	___	___
40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	___	___	___
1) Does the plan describe arrangements made with the local authorities?	___	___	___
2) Has the contingency plan been submitted to the local authorities?	___	___	___
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	___	___	___
4) Does the plan have a list of what emergency equipment is available?	___	___	___
5) Is there a provision for evacuating facility personnel?	___	___	___
6) Was there an emergency coordinator present or on call at the time of the inspection?	___	___	___

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	X		
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long? _____10 days or less _____more than 10 days (complete TSD form)			X
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	X		
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	X		
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	X		
o Transporter's name, EPA I.D. number, signature and date of signature	X		
o TSDF's name, address and EPA I.D. Number	X		
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	X		
o Manifest Document number	X		
o Proper DOT shipping description	X		
o Quantity & type of containers	X		
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	X		
262.22 - Have records been kept since November 19, 1980?	X		
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?		X	
If yes, was the incident report submitted to DOT? (obtain copy of the report)			X
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.			X

General Comments: Three vehicles are registered with the N.J. D.E.P to transport hazardous waste. One box trailer and two tank wagons [redacted] are used for transporting waste. The ID # is S-7573 AA, AB, AC. These trailers as reported are also used for transporting product.